

DANIEL J. TREUDEN, ESQ
Wisconsin Bar No. 1052766
THE BERNHOFT LAW FIRM, S.C.
1402 E. Cesar Chavez Street
Austin, Texas 78702
(512) 582-2100 telephone
(512) 373-3159 facsimile
djtreuden@bernhoflaw.com

JOEL F. HANSEN, ESQ.
Nevada Bar No. 1876
HANSEN & HANSEN, LLC
9030 W. Cheyenne Avenue, #210
(702) 906-1300 office
(702) 366-1857: facsimile
efile@hansenlawyers.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC.,
AMERICAN TECHNOLOGY SERVICES,
COMPLIANCE CONSULTANTS,
CHROME BUILDERS CONSTRUCTION,
INC., and UNIFIED DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A. and JOHN
and JANE DOES 1-100,

Defendants.

Case No. 2:18-cv-01919-RFB-BNW

**JOINT STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
DEFENDANT'S OBJECTION TO
MAGISTRATE JUDGE'S ORDER [ECF
NO. 192]
(Fourth Request)**

Pursuant to Local Rules IA 6-1, IA 6-2, 7-1, and IB 3-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the "Plaintiffs"), and the Defendant Bank of America (hereinafter "BOFA"), by and through their respective attorneys of record, hereby jointly stipulate to extend the briefing schedule for the Plaintiffs to file a response to the Defendant's Objection to the Magistrate Judge's Order. (Docs. 192 and 200.) This is the fourth stipulation requesting an extension of time to extend the deadline to

1 respond to the Defendant's Objection. (Doc. 200.) Plaintiffs' response to Defendant's Objection was
 2 originally due November 18, 2021. Prior stipulations extended the deadline to December 1, 2021, then
 3 to December 6, 2021, and then to December 15, 2021. (Docs. 211, 217, and 227.) This request seeks
 4 an extension to December 30, 2021. In support thereof, the Plaintiffs and BOFA represent as follows:

5 The Plaintiffs require additional time because of numerous converging deadlines that have
 6 made it difficult to adequately respond under the current briefing schedule. For this reason, the
 7 Plaintiffs require an extension of time to file their response to BOFA's objections to this Court's Rule
 8 30(b)(6) order.

9 Plaintiffs' counsel contacted BOFA's counsel and discussed extending the briefing deadline.
 10 Based on those discussions, the Parties stipulate to extend the deadline for Plaintiffs to respond to
 11 BOFA's Objection to the Magistrate Judge's Order to December 30, 2021. (Doc. 200.) The Parties
 12 agree that the foregoing constitutes good cause to extend the briefing schedule deadlines.

13 **IT IS SO STIPULATED.**

14 Dated: December 13, 2021
 15 THE BERNHOFT LAW FIRM, S.C.

Dated: December 13, 2021
 SNELL & WILMER, L.L.P.

16 /s/ Daniel J. Treuden
 17 Daniel J. Treuden, Esq.
 18 Wisconsin Bar No. 1052766
 19 1402 E. Cesar Chavez Street
 Austin, Texas 78702

/s/ Holly E. Cheong
 Amy F. Sorenson (NV Bar 12495)
 Blakeley E. Griffith, Esq. (NV Bar 12386)
 Holly E. Cheong (NV Bar 11936)
 3883 Howard Hughes Pkwy, Ste. 1100
 Las Vegas, Nevada 89169

20 Attorney for Plaintiffs
 21 Appearing *pro hac vice*

Attorneys for Bank of America, N.A.

22 IT IS SO ORDERED:
 23

24 

25 RICHARD F. BOULWARE, II
 26 United States District Judge

27 DATED: February 14, 2021.
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